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Maintenance Operations

May 20, 2004

U.S. Department of Transportation
400 Seventh Street, SW., Nassif Building
Room PL-401, Washington, DC 20590-001

Subject: Organization Designation Authorization Program
Docket No. FAA-2003-16685 - 24

Dear Sir/Madam,

We have reviewed the subject proposed rule that will institute a new Organization Delegation Authorization (ODA) program and eventually eliminate the Delegation Option Authorization (DOA), Designated Alteration Station (DAS), SFAR 36 authorization and Organization Designated Airworthiness Representative (ODAR) programs.

The new rules eliminated four authorizations (DOA, DAS, SFAR 36 and ODAR) and created seven new authorizations (TC, PC, TSO, STC, MRA, PMA and GA ODAs). Accompanying Order 8100.ODA clearly states that there will be one ODA authorization letter issued and only one manual is required even for multiple ODAs. However, different ODA authorizations are under the jurisdiction of different appointing offices with an OMT lead designated by each appointing office. It also states that each appointing office will convene an Evaluation Panel. We can only deduce from the proposed order that each type of ODA applied for will require a separate application, evaluation panel, OMT, manual and oversight by each appointing office (as stated in Chapter 4 of Order 8100.ODA). While at first glance, the ODA may seem to gather all previous delegations under one authority and oversight entity, it in fact does the opposite for us and other designees with multiple authorizations. Under the provisions of the new rules, we will be required to reapply for delegations that have already been granted with no provisions in the new order for procedures for "grand fathering" those with existing authorizations to facilitate the reapplications. Currently, we are under the oversight and control of the Los Angeles Aircraft Certification Office (LAACO) for both DAS and SFAR 36 delegations. The new order would require us to transition to two new authorizations, the STC ODA and the MRA ODA and apply to two different FAA offices (LAACO and Flight Standards Regional Office respectively) for these new authorizations. Apparently, each would require its own application, evaluation panel, manual and OMT. Oversight would be by these two different entities and this would effectively double the administrative burden to us. Splitting oversight between Flight Standards and Aircraft Certification could result in inconsistent definition and application of policy between the two organizations.

It is our impression that replacing four delegations with seven and splitting the oversight among four FAA departments (Flight Standards RO, ACO, MIO and AFS-800) does not benefit either the FAA or the appointed organizations. The way that the Order is structured today appears to significantly increase the administrative burden to designees.

We do welcome the expansion of authority within the new authorizations; however, we submit that the oversight and application administrative structure proposed is overly burdensome to both the FAA and the

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designees, could lead to policy inconsistencies and should be revisited with an eye to central (and singular) administrative and policy paths.

Sincerely,

A handwritten signature in black ink, appearing to read 'Larry Slate', written over the word 'Sincerely,'.

Larry Slate
Chief Engineer

cc: P. Sesny, United Airlines - SFOEG